

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

	X	
In re <i>Ex Parte</i> Application of Majed Amir Al-Attabi,	:	
<i>Petitioner</i> ,	:	Case No. 1:21-mc-00207
	:	
for an Order Pursuant to 28 U.S.C. § 1782 to Take	:	
Discovery for use in Foreign Proceedings Pending	:	
in the Republic of Lebanon.	:	

[PROPOSED] ORDER

Upon the *Ex Parte* Application of Majed Amir Al-Attabi (“Petitioner”), the Declaration of Aref El-Aref executed on February 26, 2021, together with the exhibits annexed thereto, the Declaration of James P. Bonner executed on February 26, 2021, together with the exhibits annexed thereto, and Petitioner’s Memorandum of Law in Support of *Ex Parte* Application Pursuant to 28 U.S.C. § 1782 to Take Discovery for use in Foreign Proceedings Pending in the Republic of Lebanon,

IT IS HEREBY ORDERED THAT:

1. Petitioner’s application is granted.
2. Petitioner is authorized, through his U.S. counsel at the law firm of Fleischman Bonner & Rocco LLP, to take discovery, in accordance with the Federal Rules of Civil Procedure and the Local Civil Rules of this Court, from JPMorgan Chase Bank, N.A., The Bank of New York Mellon Corporation, Citibank, N.A., and Standard Chartered Bank (collectively, the “Respondents”), including by serving subpoenas in this District seeking the documents and information identified in Exhibit 1 to the Declaration of James P. Bonner executed on February 26, 2021 and depositions of Respondents’ document custodians (the “Authorized Subpoenas”), together with a copy of this Order.

3. Petitioner is authorized to use the discovery so obtained in legal proceedings against Bank Audi S.A.L., including the proceeding pending before the court of first instance in Beirut, Lebanon under docket number 448/2020 and the proceeding in which Petitioner has obtained a pre-judgment attachment against Bank Audi S.A.L.

3. Prior to serving the Authorized Subpoenas on Respondents and in addition to complying with Federal Rule of Civil Procedure 45(a)(4), Petitioner's counsel will deliver by e-mail a copy of this Order together with the papers on which it is granted to the following counsel for Bank Audi S.A.L.: André Nohra of the Cortbaoui & Kanaan Law Firm in Beirut, Lebanon via his email address a.nohra@c-klaw.com.

4. Respondents shall comply with the Authorized Subpoenas in accordance with the Federal Rules of Civil Procedure and the Rules of this Court, including with respect to their rights to object to or move to quash the Authorized Subpoenas.

5. This Court shall retain such jurisdiction as is necessary to enforce this Order and address any motion practice with respect to the Authorized Subpoenas.

Dated: _____, 2021

SO ORDERED

Honorable Ronnie Abrams
United States District Judge